

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-CR-210

TOU LEE XIONG a/k/a “MONKEY,”
BLIA LOR a/k/a “CABBIE” a/k/a “DESTINY,”
CHER YANG a/k/a “BEAR,” and
GWEN A. BIERSTEKER

Green Bay Division

Defendants.

GOVERNMENT'S REQUEST FOR PRETRIAL SCHEDULING CONFERENCE

The United States of America, by and through its attorneys, Matthew D. Krueger, United States Attorney, and Andrew J. Maier, Assistant United States Attorney, hereby requests a pretrial scheduling conference pursuant to Fed. R. Crim. P. 17.1 and Criminal L.R. 12, for the following reasons:

1. The case involves, at present, four defendants, but the United States anticipates filing a Superseding Indictment that adds a fifth defendant and two additional charges within the next week;
2. One of the defendants is currently being transported to Wisconsin from California, with an uncertain arrival date, although there is an Initial Appearance scheduled for December 21, 2018, on the criminal complaint filed against him;
3. There is a large volume of discovery materials, including in excess of 2,000 pages, over 700 hours of audio and video recordings, and thousands of text messages and other electronic content; and

4. Because of upcoming holidays, it may take more time than usual to arrange for representation for the current defendants.

Based on the above, the United States of America requests a pretrial scheduling conference in order to more efficiently schedule the case, permit discovery to be reviewed by assigned counsel before determining whether pretrial motions will be filed in this case, and potentially discuss plea negotiations and other matters relevant to the case.

Dated at Green Bay, Wisconsin, this 21st day of November, 2018.

Respectfully submitted,

MATTHEW D. KRUEGER
United States Attorney

By:

/s Andrew J. Maier
ANDREW J. MAIER
Assistant United States Attorney